

EXHIBIT 1



MARK J. ROCHON
MEMBER
(202) 626-5819
mrochon@milchev.com

January 17, 2013

VIA FEDERAL EXPRESS

Hon. George B. Daniels
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Sokolow v. Palestine Liberation Org.*, 04-CV-397(GBD)(RLE)

Dear Judge Daniels:

I write regarding the status conference which was set for 10 am today, but was not convened because Plaintiffs' counsel failed to appear. As the Court is aware, the Court set the date and time for today's conference at the conclusion of the conference that was held on August 9, 2012. Both Mr. Schoen and Mr. Tolchin were present in the courtroom when the Court scheduled today's conference. The Court's remarks setting the conference for 10 am today were, of course, also recorded in the official transcript. *See* 8/9/12 Tr. at 84-85.

As the Court is also aware, three of Defendants' attorneys (Laura Ferguson, Brian Hill and myself) appeared at 10 am today in Courtroom 11A for the hearing. Under the circumstances, Defendants respectfully request that Plaintiffs or their counsel be required to compensate Defendants for some of the expense incurred as a result of their counsel traveling to New York to attend today's aborted conference. While Defendants could fairly request all the fees and expenses they incurred, Defendants respectfully request that Plaintiffs or their counsel be required to pay the train fare and hotel expenses for two of the three defense counsel who traveled to New York today. Those amounts total \$1426.00, and the receipts for those expenses are enclosed herewith.

Defendants had intended to ask the Court at today's hearing to set a schedule for summary judgment motions in this matter. Fact discovery in this case closed on December 21, 2012, and under the terms of the operative Scheduling Order, expert discovery will close on April 22, 2012. DE 131 ¶¶ 3-4. Although Plaintiffs have filed a motion seeking an extension of the fact and expert discovery deadlines, *see* DE 267, no order of the Court has in fact modified the original deadlines for fact or expert discovery. Accordingly, Defendants respectfully request that the Court set May 22, 2012 as the deadline for filing summary judgment motions in this matter.



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Defendants presently anticipate moving for summary judgment on all of the counts of the operative Amended Complaint in this matter. As the Court is aware, this case involves over forty individual plaintiffs who collectively seek \$3 billion in damages from Defendants for injuries they claim to have sustained in seven different attacks that took place in the Middle East over a three-year time period. Although some of the arguments Defendants anticipate advancing in their contemplated motion for summary judgment may cut across multiple incidents, plaintiffs or categories of injury, Defendants also anticipate that a certain amount of briefing will be required for each incident, category of plaintiff, or type of damage claim. Accordingly, Defendants also respectfully request that they be allowed to utilize up to 75 pages of briefing on their summary judgment motion. Obviously, if Defendants can complete their briefing in fewer pages, they will do so.

Finally, as the Court's clerk requested, we have communicated to Mr. Tolchin in order to obtain from him dates on which he is available to attend a conference in this case before Your Honor. Mr. Tolchin has represented that the Court's clerk informed him that the Court is considering dates in April. Counsel for both sides are generally available to appear before Your Honor for a status conference during the weeks of April 1 or April 15.

Sincerely,


Mark J. Rochon

Enclosures

cc: Robert J. Tolchin, Esq. (via Federal Express)
David I. Schoen (via Federal Express)

Brian Hill
 655 15th Nw St Ste 825
 Washington, DC 20005-5718

1416
 197.10
 1
 197001 EX-A
 1
 16-JAN-13 19:15
 17-JAN-13
 AX

16-JAN-13	RT1416	Room Charge	197.10
16-JAN-13	RT1416	Room Sales Tax	17.49
16-JAN-13	RT1416	City/Local Tax	11.58
16-JAN-13	RT1416	Occupancy/Tourism	2.00
16-JAN-13	RT1416	NYS Javits Ctr Tax	1.50
16-JAN-13	DEPOSIT	Deposit Applied	229.67
17-JAN-13	AX	American Express	0.00
Balance Due			0.00

For your convenience, we have prepared this zero-balance folio indicating a \$0 balance on your account. Please be advised that any charges not reflected on this folio will be charged to the credit card on file with the hotel. While this folio reflects a \$0 balance, your credit card may not be charged until after your departure. You are ultimately responsible for paying all of your folio charges in full.

EXPENSE REPORT SUMMARY

Date	Room & Tax	Food & Bev	Telecom	Other	Total	Payment
16-JAN-13	229.67	0.00	0.00	0.00	229.67	229.67
Total	229.67	0.00	0.00	0.00	229.67	229.67

Thank you for choosing Starwood Hotels. We look forward to welcoming you back soon!

As a Starwood Preferred Guest you have earned at least 591 Starpoints for this visit G545692872

Brian Hill		ROOM	DEPART	AGENT
FOLIO 197001	16-JAN-13	1416		

Hill, Brian

From: eTickets@amtrak.com
Sent: Thursday, January 17, 2013 12:03 PM
To: Hill, Brian
Subject: Amtrak: eTicket for Your Upcoming Trip
Attachments: BHILL_MILCHEV_COM_201301171203191406.pdf

SALES RECEIPT - NOT VALID FOR TRAVEL



Purchased: 01/11/2013 7:17 AM Modified: 01/17/2013 9:03 AM Retain for your records.

Merchant ID 0069060 Massachusetts Avenue Washington, DC 20002800-USA-RAILAmtrak.com

Reservation Number - 846CF5 NEW YORK PENN, NY -
WASHINGTON, DC (One-Way) JANUARY 11, 2013
Billing Information

BRIAN HILL3923 HIGHWOOD COURT, NWWASHINGTON, DC 20007
MasterCard ending in 1223 (Purchase)Authorization Code 75682P
<div style="text-align: right;">Total</div>

\$50

\$50.00

Change Summary

Original Amount Paid	\$423.00
Travel Amount Used	(\$249.00)
Subtotal	\$174.00
Revised Trip Details	
Train 2159: NEW YORK (PENN STATION), NY - WASHINGTON, DC	
Depart 1:00 PM, Thursday, January 17, 2013	
1 ACELA EXPRESS BUSINESS CL SEAT	
	\$224.00
Ticket Terms & Conditions	
ACELA EXPRESS SERVICE, NO PARTIAL REFUND IF USED ON OTHER SERVICE	
Subtotal	\$224.00
Revised Fare	\$224.00
Total	\$50.00

Important Information

- We recommend that you arrive at the station at least 30 minutes prior to your scheduled departure. Allow additional time if you need help with baggage or tickets.
- If you are traveling on the Auto Train you must check in at least two hours before scheduled departure.
- All Amtrak trains except the Auto Train are non-smoking.
- Valid photo ID required. Learn more at www.amtrak.com/ID.
- For baggage policy information, visit www.amtrak.com/baggage.
- Tickets are non-transferrable.
- Changes to your itinerary may affect your fare.
- Refund restrictions or penalties may apply. Review the refund/exchange policy at www.amtrak.com/refundexchange.
- Summary of Conditions of Contract: Ticket valid for carriage or refund for twelve

Laura Ferguson
 American Bar Association/gp
 655 15th St NW Ste 900
 Washington, DC 20005-5706

1702
 215.10
 2
 205542 EX-A
 1
 16-JAN-13 19:14
 17-JAN-13
 VI

16-JAN-13	RT1702	Room Charge	215.10
16-JAN-13	RT1702	Room Sales Tax	19.09
16-JAN-13	RT1702	City/Local Tax	12.64
16-JAN-13	RT1702	Occupancy/Tourism	2.00
16-JAN-13	RT1702	NYS Javits Ctr Tax	1.50
16-JAN-13	DEPOSIT	Deposit Applied	250.33-
16-JAN-13	1	Internet Service In Room	9.99
17-JAN-13	VI	Visa	9.99-

Balance Due 0.00

For your convenience, we have prepared this zero-balance folio indicating a \$0 balance on your account. Please be advised that any charges not reflected on this folio will be charged to the credit card on file with the hotel. While this folio reflects a \$0 balance, your credit card may not be charged until after your departure. You are ultimately responsible for paying all of your folio charges in full.

EXPENSE REPORT SUMMARY

Date	Room & Tax	Food & Bev	Telecom	Other	Total	Payment
16-JAN-13	250.33	0.00	9.99	0.00	260.32	250.33-
Total	250.33	0.00	9.99	0.00	260.32	250.33-

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As a Starwood Preferred Guest you have earned at least 430 Starpoints for this visit C50442139420

Laura Ferguson		ROOM	DEPART	AGENT
FOLIO 205542	16-JAN-13	1702		

Ferguson, Laura

From: eTickets@amtrak.com
Sent: Thursday, January 17, 2013 12:04 PM
To: Ferguson, Laura
Subject: Amtrak: eTicket for Your Upcoming Trip
Attachments: LFERGUSON_MILCHEV_COM_201301171203558354.pdf

SALES RECEIPT - NOT VALID FOR TRAVEL



Purchased: 01/11/2013 7:15 AM Modified: 01/17/2013 9:03 AM Retain for your records.

Merchant ID 0074760 Massachusetts Avenue Washington, DC 20002800-USA-RAILAmtrak.com

Reservation Number - 846C6D NEW YORK PENN, NY
 - WASHINGTON, DC (One-Way) JANUARY 11, 2013
 Billing Information

LAURA FERGUSON 5018 EUCLID DRIVE KENSINGTON, MD 20895

Visa ending in 8602 (Purchase) Authorization Code 005365

\$50

Total

\$50.00

Change Summary

Original Amount Paid	\$423.00
Travel Amount Used	(\$249.00)
	Subtotal
	\$174.00

Revised Trip Details **Train 2159: NEW YORK (PENN STATION), NY -**

WASHINGTON, DC Depart 1:00 PM, Thursday, January 17, 2013

1 ACELA EXPRESS BUSINESS CL SEAT

\$224.00

Ticket Terms & Conditions ACELA EXPRESS SERVICE, NO PARTIAL REFUND IF USED ON OTHER SERVICE

Subtotal

\$224.00

Revised Fare

\$224.00

Total

\$50.00

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- All Amtrak trains except the Auto Train are non-smoking.
- Valid photo ID required. Learn more at www.amtrak.com/ID.
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- Refund restrictions or penalties may apply. Review the refund/exchange policy at www.amtrak.com/refundexchange.
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